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**UNITED STATE DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

Judge: Hon. Virginia K. DeMarchi

Pursuant to Civil Local Rule 79-5(f), Plaintiffs submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed with respect to (1) Plaintiffs' Reply in Support of Motion to Exclude Expert Testimony and supporting materials, and (2) Plaintiffs' Reply in Support of Motion to Certify Class Under Fed. R. Civ. 23(b)(2) and 23(b)(3) and supporting materials. The documents and/or portions of documents that have been designated by Defendant Google LLC as "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order entered on August 6, 2024 (ECF 107) in this matter, and which Plaintiffs seek to provisionally file under seal, are listed below:

Document	Portions to be Sealed
Plaintiffs' Reply in Support of Motion to Exclude Expert Testimony	Document in its entirety
Ex. C to Declaration of Pamela I. Yaacoub in Support of Plaintiffs' Reply in Support of Motion to Exclude Expert Testimony, <i>Csupo v. Google</i> Trial Transcript excerpts	Document in its entirety
Plaintiffs' Reply in Support of Motion to Certify Class Under Fed. R. Civ. 23(b)(2) and 23(b)(3)	Document in its entirety
Ex. A to Declaration of Karma M. Giulianelli in Support of Plaintiffs' Motion to Certify Class, <i>Csupo v. Google</i> Trial Transcript excerpts	Document in its entirety
Ex. B to Declaration of Karma M. Giulianelli in Support of Plaintiffs' Motion to Certify Class, <i>Csupo v. Google</i> Decert & Recert Order	Document in its entirety
Ex. E to Declaration of Karma M. Giulianelli in Support of Plaintiffs' Motion to Certify Class, Bradley Nelson Deposition Transcript excerpts	Document in its entirety

Pursuant to Civil Local Rule 79-5(d), Plaintiffs provisionally file under seal unredacted copies of these materials. Plaintiffs provide notice to Google that these materials will be placed in the public court file unless Google timely files its statement and/or declaration in support of sealing. *See* Civil Local Rules 79-5(f)(3); 79-5(c)(1). Plaintiffs reserve the right to oppose any submission Google makes under Civil Local Rule 79-5(f)(3). *See* Civil Local Rule 79-5(f)(4).

1 Dated: July 29, 2025

Respectfully submitted,

2 BARTLIT BECK LLP

3 /s/ Karma M. Giulianelli

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